

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

FROST SOLUTIONS, LLC,

Plaintiff,

v.

Case No. 1:22-cv-00401-SE

PATRICK BAGLIEN, CHRISTOPHER
LAREAU, and VUE ROBOTICS, LLC,

Defendants.

DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY

Pursuant to Local Rule 7.1(e)(2), Defendants Patrick Baglien, Christopher Lareau, and Vue Robotics, LLC (collectively, “Defendants”), through their counsel, move for leave of Court to file the attached Reply Memorandum in response to Plaintiff Frost Solutions, LLC’s (“Frost Solutions”) Objection to Defendants’ Motion for Referral to Mediation and to Stay Proceedings (ECF Nos. 66, 71). In support of this motion, Defendants state:

1. On April 3, 2024, Frost Solutions filed its objection to the Motion. Frost Solutions’ objection contains erroneous and misguided statements that distract, and Defendants’ believe the proposed very brief Reply refocuses the issue that matters: mediation with the court now, before all of the wasting insurance policy is wasted, is sensible.

2. Defendants respectfully suggest that the attached Reply Memorandum will assist the Court in consideration of the Motion.

3. Pursuant to LR 7.1(e)(2), Defendants’ proposed Reply Memorandum is attached as Exhibit A hereto.

4. Pursuant to LR 7.1(c), counsel for Defendants sought concurrence from counsel for Frost Solutions via email on April 10, 2024, and counsel for Frost Solutions does not object to the relief requested.

5. Pursuant to LR 7.1(a)(2), no memorandum of law is needed, as the relief requested herein is within the sound discretion of the Court.

WHEREFORE, Defendants respectfully request that this Court:

- (A) Grant Defendants leave to file the attached proposed Reply Memorandum; and
- (B) Grant such other relief as the Court deems just and appropriate.

Dated: April 10, 2024

Respectfully submitted,

PATRICK BAGLIEN, CHRISTOPHER LAREAU, AND VUE ROBOTICS, LLC,

By their attorneys,

/s/ David W. McGrath

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LOCAL RULE 7.1(c) CERTIFICATE

Undersigned counsel certifies that counsel for Defendants sought concurrence of counsel for Frost Solutions regarding this Motion for Leave via email on April 10, 2024, and counsel for Frost Solutions does not object to the relief requested.

Dated: April 10, 2024

/s/ David W. McGrath

David W. McGrath

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically served copies of this document and exhibit thereto on all counsel of record via the Court's CM/ECF system, pursuant to Fed. R. Civ. P. 5(b)(2)(E).

Dated: April 10, 2024

/s/ David W. McGrath

David W. McGrath